

CGB-CC-0349



# Christ Is The Rock, Inc.

523 S. Pat Thomas Parkway Quincy, FL 32351

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Dr. Willie C. Green, Founder/Director

"SAVING THE WORLD ONE soul AT A TIME"

December 21, 2005

FCC Office of the Secretary  
ATT: CGB Room 3-B431  
445 12<sup>th</sup> Street, SW  
Washington, D. C. 20554

## REQUEST FOR EXEMPTION TO CLOSED CAPTIONING REQUIREMENT

Dear Sir or Madam:

Holy Temple/Christ Is The Rock is a local Christian program that has been broadcasting on WMBB-TV-13 in Panama City, Florida for more than ten years. Our telecast airs from 6:30 AM until 7:00 AM on Sunday mornings, at a cost of \$250 per telecast. The cost of closed captioning would add an additional \$150, at the very least, to the cost of each program. This is an increase of 60%. Other options are even more expensive (See attached options). Requiring that we add closed captioning to our locally produced program would amount to an undue burden and would effectively force our program off the air. Therefore, we are requesting the FCC to grant us an exemption based on the "undue hardship rule". We request this exemption based on the following:

- Closed captioning would have to be provided by an outside agency at a cost that we could not afford (\$150-\$600 per program).
- Purchasing Closed captioning equipment is beyond our budget (See estimates attached)
- This is a local program that receives limited support from local viewers
- Our annual budget barely covers the cost of air time and production cost
- Adding closed captioning would increase our cost by at least 60% and as much as 150%
- Forcing a small program like our off the air because of the cost of closed captioning would be unfair to our loyal, local viewers.

Please grant our request for an exemption. If you need additional information, you may contact me at the above address.

Sincerely,

Willie C. Green

Holy Temple  
Pastor Green  
802 East 8<sup>th</sup> Street  
Panama City, FL 32401

November 18th, 2005

Dear Pastor Green,

Effective January 1, 2006, the Federal Communications Commission is requiring that all programming be broadcast with closed captioning. While there are a few exceptions to this requirement, unfortunately Evangel Temple does not fall into any of the exempt categories. At this time, WMBB does not have the necessary equipment to close caption programming, so captioning your program is the advertiser's responsibility.

Please understand that we appreciate your business, and realize that this requirement may place an additional financial burden on your operation. Never the less, WMBB will only accept closed captioned programming for broadcast effective January 1, 2006.

Please feel free to contact me should you have the need to discuss this matter further.

Sincerely,  
Teri A. Savage, Account Executive  
Ray Hundley, General Sales Manager

**Option 1:**

We have an Encoder that can provide Closed Captioning (Live) with the help of an outside vender doing the captioning and sending the data back. We will have to make use of 2 phone lines for this purpose. Since the 2 phone calls will not be 1-800 there would be long distance charges. We would also need to give out our MCR number for a trouble line during the time that we are Closed Captioning a show. The cost of the Closed Captioning service is \$150 and up per hour depending on who is contracted. This can be billed to a third party. There is about a 2 second delay to when the closed captioning appears on the screen.

**Option 2:**

A tape could be sent in to the Closed Captioning service. There would be about a week turnaround. The cost would be about \$600 for a 1 hour show.

**Option 3:**

If the maker of show wants to control their own captioning, they would need the following:

**An Encoder \$3000 and up depending on functions.**

(example PDR885 plus modem \$2900. this is Link Electronics)

Software \$3000 plus a computer.

Plus a person who is a stenographer with a court reporter machine.

Has to be able to create ASKE stream.

An audio coupler

Closed Captioning Services  
Visualdata 888-418-4782 145 West Magnolia  
National Captioning Institute  
NewDay.com 800-834-6606  
Captionmax.com 800-822-3566  
Vitac.com  
Anyway there are several.

## **Closed Caption Software Vendors**

**Cheetah International**  
40 North Swan Road  
Suite 112  
Tucson, AZ 85711  
(800) 869-6986 (voice/tty)  
(520) 722-2210  
FAX (520) 886-6286

**Computer Prompting & Captioning (CPC)**  
1010 Rockville Pike Suite 306  
Rockville, MD 20852-1419  
(301) 738-8487  
FAX (301) 738-8488

**Rapidtext**  
1801 Dove Street  
Suite 101  
Newport Beach, CA 92660

(949) 399-9200  
FAX (949) 399-9273  
TDD (949) 399-9273

SoftNI Corporation  
11400 West Olympic Boulevard  
Second Floor  
Los Angeles, CA 90064  
(310) 312-9558  
Fax: (310) 312-9557  
[www.softni.com](http://www.softni.com)  
[www.subtitler.com](http://www.subtitler.com)

Ryan Kinser 703-917-7643 National Captioning Institute. Ryan will be the person to set up the captioning.

Mark Shaeffer senior production engineer  
703-917-7667  
Live engineering support 24/7

Dian Leonard 212-462-0060 with Caption Max.  
\$150 for live broadcast captioning. Rapid Tex. Kathy Furlan

The audio coupler we need is a Comrex Part number #  
TCB-2 auto answer unbalanced audio